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April 8, 2025 VIA ECF

Hon. Margaret M. Garnett United States District Judge Southern District of New York 40 Foley Square, Room 2102 New York, NY 10007

Re: Daniel Schapira v. NetBase Solutions, Inc. d/b/a Quid

Civil Action No. 1:25-CV-01730 (MMG)

Dear Judge Garnett:

We represent defendant NetBase Solutions, Inc. ("Defendant") in connection with the above-referenced matter. Pursuant to Section 1.B.5 of Your Honor's Individual Rules of Practice, we write to respectfully request an adjournment of the Initial Pretrial Conference scheduled for May 6, 2025. The adjournment is being requested because counsel for Defendant was directed to appear, via order to show cause, for a preliminary injunction hearing in New York State Supreme Court on the morning of May 6, 2025. No previous requests for an adjournment have been made, and Plaintiff's counsel has consented to our request. We have conferred with Plaintiff's counsel and propose the following alternative dates for the conference:

May 22, 23, 28, 30 June 2-4, 9-13

We thank the Court for its time and attention to this matter.

Respectfully submitted,

**DLA Piper LLP (US)** 

/s/ Daniel Turinsky

Daniel Turinsky Partner Application GRANTED. The Initial Pretrial Conference currently scheduled for May 6, 2025 is hereby ADJOURNED to **Thursday**, **May 22, 2025, at 9:30 a.m.** The conference shall be held in person in Courtroom 906 of the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007. In accordance with the Court's Individual Rules & Practices, the parties' joint letter and proposed Civil Case Management Plan shall be due no later than **May 15, 2025**. The Clerk of Court is respectfully directed to terminate Dkt. No. 12.

SO ORDERED. Date: 4/8/2025.

HON. MARGARET M. GARNETT UNITED STATES DISTRICT JUDGE